

the date set in the Court's Amended Order. Private Plaintiffs also anticipate that they will have to modify witness schedules as the trial progresses depending on how long each witness examination actually takes, and that some culling of witnesses will occur as the trial progresses and Private Plaintiffs identify which claim or claims require more or less evidence.

Accordingly, Private Plaintiffs respectfully request that this Court modify its August 8 Amended Order to: (1) extend to August 18 the date by which the parties are to provide the requested witness schedule, including identifying counsel expected to conduct direct and cross examinations for each witness; (2) allow the parties to identify the week of the trial a witness will be called rather than a specific day; and (3) direct the parties to provide, to all other parties, twenty-four hour notice of the names of the witnesses they will call on each trial day.

Private Plaintiffs further submit that this modification will allow the parties to update or supplement their witness lists in accordance with the bifurcation proposal the Court adopts after the parties file their notices on August 11, 2023 setting forth their positions on bifurcation.

Private Plaintiffs intend to provide an estimate of the length of their affirmative case, as well as a proposal on the scope of the Phase I trial, on August 11 in response to the Court's Amended Order.

Dated: August 10, 2023

For LUPE Plaintiffs:

/s/ Nina Perales

Nina Perales (TX Bar No. 24005046)
Julia R. Longoria (TX Bar No. 24070166)
Fátima L. Menéndez (TX Bar No. 24090260)
Kenneth Parreno (MA BBO No. 705747)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205

Respectfully Submitted,

Tel: (210) 224-5476; Fax: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org
fmenendez@maldef.org
kparreno@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*

FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004
Tel: (212) 859-8000; Fax: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

Attorneys for Plaintiffs:

**LA UNIÓN DEL PUEBLO ENTERO,
SOUTHWEST VOTER REGISTRATION
EDUCATION PROJECT, MEXICAN
AMERICAN BAR ASSOCIATION OF
TEXAS, TEXAS HISPANICS
ORGANIZED FOR POLITICAL
EDUCATION, JOLT ACTION,
WILLIAM C. VELASQUEZ INSTITUTE,
FIEL HOUSTON INC.**

**Admitted pro hac vice*

/s/ Sean Morales-Doyle

Sean Morales-Doyle

Patrick A. Berry*

Jasleen K. Singh*

Robyn N. Sanders*

BRENNAN CENTER FOR JUSTICE AT NYU

SCHOOL OF LAW

120 Broadway, Suite 1750

New York, NY 10271

Telephone: (646) 292-8310

sean.morales-doyle@nyu.edu

patrick.berry@nyu.edu

jasleen.singh@nyu.edu

rs8592@nyu.edu

** Admitted pro hac vice*

Leah J. Tulin*

BRENNAN CENTER FOR JUSTICE AT NYU

SCHOOL OF LAW

1140 Connecticut Avenue NW, Suite 1150

Washington, DC 20036

(202) 650-6397

tulinl@brennan.law.nyu.edu

** Admitted pro hac vice*

Paul R. Genender (Tex. Bar No. 00790758)
Elizabeth Y. Ryan (Tex. Bar No. 24067758)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
(214) 746-8158
paul.genender@weil.com
liz.ryan@weil.com

Attorneys for Plaintiffs:

**FRIENDSHIP-WEST BAPTIST
CHURCH, TEXAS IMPACT, JAMES
LEWIN**

For OCA Greater Houston Plaintiffs:

/s/ Zachary Dolling

Zachary Dolling

Texas Bar No. 24105809

Hani Mirza

Texas Bar No. 24083512

Sarah Chen*

California Bar No. 325327

Veronikah Warms*

Texas Bar No. 24132682

TEXAS CIVIL RIGHTS PROJECT

1405 Montopolis Drive

Austin, TX 78741

512-474-5073 (Telephone)

512-474-0726 (Facsimile)

zachary@texascivilrightsproject.org

hani@texascivilrightsproject.org

schen@texascivilrightsproject.org

veronikah@texascivilrightsproject.org

Thomas Buser-Clancy

Texas Bar No. 24078344

Edgar Saldivar

Texas Bar No. 24038188

Savannah Kumar

Texas Bar No. 24120098

Ashley Harris

Texas Bar No. 24123238

ACLU FOUNDATION OF TEXAS, INC.

5225 Katy Freeway, Suite 350

Houston, TX 77007

Telephone: (713) 942-8146

Fax: (915) 642-6752

tbuser-clancy@aclutx.org

esaldivar@aclutx.org

skumar@aclutx.org

aharris@aclutx.org

Adriel I. Cepeda Derieux*

Ari Savitzky*

Sophia Lin Lakin*

Dayton Campbell-Harris

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

125 Broad St., 18th Floor

New York, NY 10004

(212) 284-7334

acepedaderieux@aclu.org

asavitzky@aclu.org

slakin@aclu.org

dcampbell-harris@aclu.org

Susan Mizner*

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

39 Drumm St.

San Francisco, CA 94111

(415) 343-0781 (phone)

smizner@aclu.org

Brian Dimmick*

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

915 15th St. NW

Washington, DC 20005

(202) 731-2395 (phone)

bdimmick@aclu.org

LUCIA ROMANO

Texas State Bar No. 24033013

PETER HOFER

Texas State Bar No. 09777275

CHRISTOPHER MCGREAL

Texas State Bar No. 24051774

DISABILITY RIGHTS TEXAS

2222 West Braker Lane

Austin, Texas 78758-1024

(512) 454-4816 (phone)

(512) 454-3999 (fax)

lromano@drtx.org

phofer@drtx.org

cmcgreal@drtx.org

Jerry Vattamala*

Susana Lorenzo-Giguere*

Patrick Stegemoeller*

**ASIAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND**

99 Hudson Street, 12th Floor

For OCA Greater Houston Plaintiffs
(continued):

New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org
pstegemoeller@aaldef.org
Jessica Ring Amunson*
Alyssa G. Bernstein*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
abernstein@jenner.com

Gregory D. Washington*
JENNER & BLOCK LLP
455 Market St. Suite 2100
San Francisco, CA 94105
gWASHINGTON@jenner.com

***COUNSEL FOR OCA-GREATER
HOUSTON PLAINTIFFS***

**admitted pro hac vice*

For Mi Familia Vota and HAUL Plaintiffs:

/s/ Courtney Hostetler

Courtney Hostetler*

Ron Fein*

John Bonifaz*

Ben Clements*

FREE SPEECH FOR THE PEOPLE

1320 Centre Street, Suite 405

Newton, MA 02459

(617) 249-3015

chostetler@freespeechforpeople.org

rfein@freespeechforpeople.org

jbonifaz@freespeechforpeople.org

bclements@freespeechforpeople.org

Wendy Olson* Elijah

Watkins* Mark Bieter*

STOEL RIVES LLP

101 S. Capital Boulevard, Suite 1900

Boise, ID 83702

Telephone: (208) 389-9000

wendy.olson@stoel.com

elijah.watkins@stoel.com

mark.bieter@stoel.com

Bradley Prowant*

John Katuska*

STOEL RIVES LLP

33 S. Sixth Street, Suite 4200

Minneapolis, MN 55402

Telephone: (612) 373-8800

bradley.prowant@stoel.com

john.katuska@stoel.com

Laura Rosenbaum*

STOEL RIVES LLP

760 SW Ninth Ave., Suite 3000

Portland, OR 97205

Telephone: (503) 224-3380

laura.rosenbaum@stoel.com

Sean Lyons

Clem Lyons

LYONS & LYONS, P.C.

237 W. Travis Street, Suite 100 San

Antonio, Texas 78205

Telephone: (210) 225-5251

sean@lyonsandlyons.com

*Admitted pro hac vice

Counsel for Plaintiffs Mi Familia Vota, Marla López, Marlon López, and Paul Rutledge (“MFV Plaintiffs”)

/s/ Jennifer A. Holmes

Jennifer A. Holmes*

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

700 14th Street NW, Suite 600

Washington, DC 20005

Telephone: (202) 682-1300

Facsimile: (202) 682-1312

jholmes@naacpldf.org

Amir Badat*

Victor Genecin*

Breanna Williams*

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor New

York, NY 10006

Telephone: (212) 965-2200

Facsimile: (212) 226-7592

abadat@naacpldf.org

vgenecin@naacpldf.org

bwilliams@naacpldf.org

Shira Wakschlag*

THE ARC OF THE UNITED STATES, INC.

1825 K Street, NW, Suite 1200

Washington, DC 20006

Telephone: (202) 534-3708

Facsimile: (202) 534-3731

Wakschlag@thearc.org

Kenneth E. Broughton

Texas Bar No. 03087250

J. Keely Pippin

Texas Bar No. 24116306

REED SMITH LLP

811 Main Street, Suite 1700

Houston, TX 77002-6110

Telephone: (713) 469-3800
Facsimile: (713) 469-3899
kbroughton@reedsmith.com
kpippin@reedsmith.com

Sarah Cummings Stewart
Texas Bar No. 24094609
REED SMITH LLP
2850 N. Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: (469) 680-4200
Facsimile: (469) 680-4299
sarah.stewart@reedsmith.com

J. Michael Showalter*

ARENTFOX SCHIFF LLP
South Wacker Drive, Suite 7100
Chicago, IL 60606
Tel: (312) 258-5561
j.michael.showalter@afslaw.com

*Admitted *pro hac vice*

*Counsel for Plaintiffs Houston Area
Urban League; Delta Sigma Theta
Sorority, Inc.; The Arc of Texas; and
Jeffrey Lamar Clemmons (“HAUL
Plaintiffs”)*

For LULAC Plaintiffs:

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta*

Christopher D. Dodge*

Michael B. Jones*

Noah B. Baron*

Elena A. Rodriguez Armenta*

Daniela Lorenzo*

Marcos Mocine-McQueen*

Marisa A. O’Gara*

Omeed Alerasool*

ELIAS LAW GROUP LLP

250 Massachusetts Avenue NW, Suite 400

Washington, D.C. 20001

Telephone: (202) 968-4490

unkwonta@elias.law

cdodge@elias.law

mjones@elias.law

nbaron@elias.law

erodriguezarmenta@elias.law

dlorenzo@elias.law

mmcqueen@elias.law

mogara@elias.law

oalerasool@elias.law

Counsel for LULAC Plaintiffs

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 10th day of August, 2023.

/s/ Wendy J. Olson
Wendy J. Olson